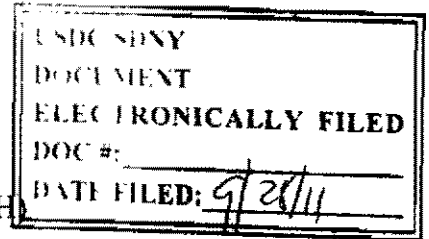


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
IN RE WORLD TRADE CENTER DISASTER :
SITE LITIGATION : 21 MC 100 (AKH)

----- :
IN RE WORLD TRADE CENTER LOWER :
MANHATTAN DISASTER SITE LITIGATION : 21 MC 102 (AKH)

----- :
IN RE COMBINED WORLD TRADE CENTER :
AND LOWER MANHATTAN DISASTER SITE :
LITIGATION : 21 MC 103 (AKH)



NOTICE OF MOTION FOR STAY PENDING APPEAL

PLEASE TAKE NOTICE that on a day to be determined by this Court, Defendants the City of New York and the Contractors ("Defendants") shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York, located at 500 Pearl Street, New York, New York, Room 14-D for an Order, pursuant to Rule 62(d) of the Federal Rules of Civil Procedure, Granting Defendants' Motion for Stay Pending Appeal.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendants rely upon the annexed Affidavit of Christine LaSala, sworn to September 21, 2011, the accompanying Memorandum of Law in Support of Motion for Stay Pending Appeal, and all prior proceedings had herein.

Dated: September 21, 2011

The motion for a stay is granted. The filing of a supersedeas bond, in the circumstances of this case, would be wasteful and is unnecessary. The Allocation Neutral advises that no undue burden would be experienced by delaying bonus payments. Plaintiffs do not object.

James E. Tyrrell, Jr.
James E. Tyrrell, Jr. (NY 6837)
HATTON BOGGS LLP
1185 Avenue of the Americas
New York, New York 10036
(212) 246-5100

-and-

One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102
(973) 848-5600

Attorneys for Defendants The City of New York
and the Contractors

9/28/11
Alvin K. Hellerstein